

IN THE CAMPBELL COUNTY CIRCUIT COURT

LESTER EUGENE SILER, et al.)
)
 Plaintiffs,)
)
v.)
)
)
Campbell County Tennessee, et al) No. 12792
)
 Defendants.)

**Plaintiffs' First Set Of Fed. R. Civ. P. 34 Production of
Documents For Inspection And Copying to Campbell County
Tennessee**

Plaintiff submits the following request for production of documents, records, electronically stored information, pictures, handwritten notes, typewritten materials, tape recorded materials or other things for inspection and copying to Defendant Campbell County Tennessee to designate a person with knowledge to produce for inspection and copying pursuant to Tennessee Rules of Civil Procedure Rule 34:

1. A complete copy of the rules, policies and procedures of the Campbell County Sheriff's Department that were in effect on July 8, 2004.

2. All things that pertain to the investigation that led up to the Siler trailer incident.

3. Each document, record, statement, report, memorandum or witness statement, whether handwritten, typed,

tape recorded or electronically stored that contains the name of Lester Eugene Siler or Jenny Siler;

4. All such things concerning the Siler trailer incident created after the July 8, 2008 Siler trailer incident;

5. All reports, memorandums or statements that pertain to the Siler trailer incident;


6. All recordings including but not limited to E-911 recordings; Sheriff Department Dispatch recordings; the Siler tape recording; and any witness statements recordings pertaining to the Siler Trailer incident;

7. Personnel and employment files of each named Defendant in this case;

8. Sheriff Department files pertaining to each named Defendant in this case;

9. Training files pertaining to each named Defendant in this case;

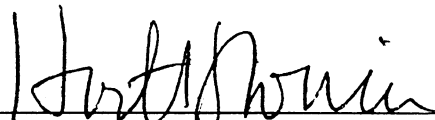
10. An agreement to abide by the Tennessee Bureau of Investigation Protective Order for access to the file pertaining to the investigation of the Siler Trailer incident.


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Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2008 a copy of the foregoing was served on all counsel of record.


HERBERT S. MONCIER
Attorney for Plaintiffs